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DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL HEALTH

150 West North Temple, P.O. Box 2500, Salt Lake City, Utah 84110-2500

Marv H. Maxell, Ph.D., Acting Director
Room 474 801-533-6121

November 16, 1982
533-6108

RECEIVED
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DIVISION OF
OIL, GAS & MINING

Robert N. Heistand
Paraho Development Corporation
183 Inverness Drive West Suite 300 A
Englewood, CO 80112

RE: Feasibility Approval Order for
Air Controls for the Paraho
Project, Uintah County

Dear Mr. Heistand:

On August 25, 1982, the Executive Secretary published a notice of intent to grant a feasibility approval order for your oil shale mining, surface retorting, and product upgrading operation in Uintah County. The public comments received during the public hearing, which was held in Vernal, Utah on September 23, 1982, and during the 30 day comment period, have been adequately addressed and no adverse air quality impacts are expected from the project.

The Utah Air Conservation Committee (UACC) approved the feasibility of the project at their meeting held on November 5, 1982, in accordance with Section 3.1.8c, Utah Air Conservation Regulation, UACR.

This air quality feasibility approval order authorizes Paraho Development Corporation to proceed with the project as proposed and in accordance with the time schedule contained in your notice of intent dated November 30, 1981 with changes as negotiated with the Executive Secretary and based upon the following conditions:

1. Detailed plans and specifications for each source, process, installation, and air control facility shall be submitted to the Executive Secretary as they become available. Individual emission control requirements based on a Best Available Control Technology (BACT) evaluation shall be established by approval order in accordance with the provisions of Section 3.1, UACR, for each source, process, installation, and air pollution control facility proposed as detailed plans and specifications are submitted for each phase of the Paraho Project. No construction, installation, modification, or operation shall begin on a source, process, installation, or air pollution control facility of the project until an approval order has been granted by the Executive Secretary for that portion of the project.

2. An emissions inventory which represents current BACT has been established based on the information contained in Paraho's PSD application and subsequent negotiations with the staff of the Bureau of Air Quality. This emissions inventory is contained in Paraho's Engineering Evaluation Summary prepared by the BAQ. Based on this inventory, an air quality impact analysis was conducted and predicted PSD increment consumption for SO₂ and TSP emissions was established and the resulting baseline area was determined. The PSD increments are hereby allocated to Paraho for the total project based on the increment consumption predicted in the above referenced analysis. These are maximum increment allocations and shall not be exceeded. The UACC may require Paraho to conduct additional air quality impact analyses of the total project subsequent to approval orders being issued for each phase to determine if the increments allocated for completion of the project should be adjusted. If the UACC, after consultation with Paraho, determines from a required analysis, that increments in excess of those necessary to allow project completion based on the most recent BACT analysis exist, and that there is a need to use the excess for additional permitting, the UACC may modify the increment allocation by approval order following public notice. Any increment previously allocated to Paraho which is not consumed is not the right of Paraho but shall be retained by the State for appropriate reallocation.

3. The status of the project shall be reviewed by the Executive Secretary at least once every 18 months after the date the feasibility approval order is issued or as modified by Paraho and approved by the Executive Secretary. Deviations from the approved time schedule which would result in a non-continuous program of construction, development, or establishment may be cause for the Executive Secretary to revoke that portion of the approval order associated with the unconstructed or nonfunctional elements of the project pursuant to Section 3.1.5, UACR. Proposed changes to the schedule shall be presented to the Executive Secretary for review to determine whether the proposed changes will constitute a continuous program of construction, installation, development, or establishment.

4. Post construction ambient monitoring shall be performed by Paraho for at least a one year period after the completion of each phase of the project for the purpose of evaluating the impacts of the previous phase(s). This condition shall in no way impede construction from proceeding on approved subsequent phases of the project. Pre-construction monitoring shall not be required for subsequent scheduled phases. A monitoring plan shall be provided to the Executive Secretary for approval prior to post construction monitoring.

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As you are a major source, Section 3.9, UACR requires a fee for the cost of processing the feasibility approval order. The final costs are enclosed and are payable upon receipt of this approval order to the Utah State Department of Health (sent through the Executive Secretary).

Sincerely,

Brent C. Bradford
Executive Secretary
Utah Air Conservation Committee

DR:wml
cc: EPA Region VIII (D. Kircher)
 Uintah Basin District Health Dept.
 Division of Oil, Gas and Mining
Enclosures
1873

ITEMIZED COSTS FOR NOTICE OF INTENT FOR
PARAHO PROJECT

The following are final costs incurred by the Bureau of Air Quality to review your proposal and issue an approval order. The payment should be made to the Utah State Department of Health and is due upon receipt of the approval order.

Engineering Review	\$3,432.70
Computer (Indirect)	\$ 344.00
Administrative Overhead	\$ 347.15
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TOTAL	\$4,023.85